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Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR 12-00834 EMC
	)	
Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del> ORDER
	)	EXCLUDING TIME UNDER THE SPEEDY
v.	)	TRIAL ACT FROM JANUARY 30, 2013 TO
	)	FEBRUARY 27, 2013
MONICO DOMINGUEZ,	)	
JUAN DOMINGUEZ, JR.,	)	
SHAWN GEERNAERT	)	
	)	
Defendant.	)	
	)	

On January 30, 2013, the parties in this case appeared before the Honorable Edward M. Chen for a status hearing. At that time, the parties represented that the government was preparing to produce to defense counsel a set of additional discovery and that the defense would need additional time to review the discovery and to conduct additional investigation. Moreover, counsel for Mr. Dominguez indicated that he was preparing to file a motion to disclose the identity of the confidential informant(s) in the case and counsel for Mr. Dominguez, Jr. Stated that she was considering moving to sever. The parties jointly requested an extension of time and stipulated that time should be excluded from January 30, 2013 until February 27, 2013, for

1 effective preparation of defense counsel. The parties represented that granting the continuance  
2 was for the reasonable time necessary for effective preparation of defense counsel, taking into  
3 account the exercise of due diligence. See 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

4 The parties also agreed that the ends of justice served by granting such a continuance  
5 outweighed the best interests of the public and the defendants in a speedy trial. See 18 U.S.C. §  
6 3161(h)(7)(A).

7  
8 IT IS SO STIPULATED:

MELINDA HAAG  
United States Attorney

9  
10 DATED: February 26, 2013

/s/  
\_\_\_\_\_  
RANDY LUSKEY  
Assistant United States Attorney

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13 DATED: February 26, 2013

/s/  
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JAI GOHEL  
Attorney for Monico Dominguez

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15  
16 DATED: February 26, 2013

/s/  
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JODI LINKER  
Attorney for Juan Dominguez Jr.

17  
18  
19 DATED: February 26, 2013

/s/  
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JOSEPH STOGNER  
Attorney for Shawn Geernaert

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1 IT IS HEREBY ORDERED that time is excluded under the Speedy Trial Act from  
2 January 30, 2013 through February 27, 2013, under 18 U.S.C. § 3161(B)(iv) and 18 U.S.C. §  
3 3161(h)(7)(A).

4  
5 IT IS SO ORDERED.

6  
7 DATED: 2/27/13

